

IN THE UNITED STATES DISTRICT COURT

Case 1:10-cv-02380-WDQ Document 1-1 Filed 08/27/10 Page 1 of 4

ENTERED  
RECEIVED

Rodney Higgs  
37 South Cecil St.  
Philadelphia, PA.  
19139

(Full name and address of the plaintiff)

v.

Civil Action No. WDQ CV 2380  
(Leave blank. To be filled in by Court.)

Sierra Nevada Corp.  
18635 JarKey Drive  
Hagerstown, MD.  
21742

(Full name and address of the defendant(s))

**COMPLAINT FOR EMPLOYMENT DISCRIMINATION**

1. Plaintiff is a resident of Philadelphia PA. 19139  
(Fill in county or city and state of residence)
2. Defendant(s) reside(s) or does business at the following location: 18635

JarKey Drive Hagerstown Md. 21742

3. This action is brought pursuant to (check all spaces that apply):

- Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, sex, or national origin.
- Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age. My date of birth is: \_\_\_\_\_

Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.

4. I am complaining about (check all that apply):

Failure to hire me. I was refused a job on the following date: \_\_\_\_\_  
\_\_\_\_\_

Termination of my employment. I was terminated from my employment on the

following date: April 21, 2008 (4-21-09)

Failure to promote me. I was refused a promotion on the following date:

Other (explain what happened): Racially discriminated  
against for the duration of  
my employment with said company.

5. The conduct of Defendant(s) was discriminatory because it was based on (check all that apply):

race  color  religion  sex  age  national origin  disability

6. The facts of my claim are: On file with the  
EEOC and will be requested after  
filing this paperwork. I also have  
drawings, phone numbers and names  
of witness'.

7. The approximate number of people employed by Defendant is: 1000.

8. The events I am complaining about took place on the following dates or time period:

June 2008 thru April 2009

9. I filed charges on the following date: Jan 2009, with:

Equal Employment Opportunity Commission (EEOC)

Maryland Human Relations Commission

Other (give name of agency and location): \_\_\_\_\_

10. I received a right to sue letter (attach copy) on the following date: July, 13

2010

WHEREFORE, Plaintiff asks the Court to grant such relief as may be appropriate, including but not limited to (check all that apply):

Injunctive relief (specify what you want the Court to order): \_\_\_\_\_

- Back pay.
- Reinstatement to my former position.
- Monetary damages in the amount of: 100,000<sup>00</sup>
- Costs and attorneys fees.

Other (specify): \_\_\_\_\_

8-21-10

(Date)

Rodney Higgs

(Signature)

Rodney Higgs

31 S. Cecil St.

Philadelphia, PA.

19139

(Printed name, address and phone number of Plaintiff)